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February 9, 2021

**VIA ECF**

United States District Court  
Eastern District of New York  
814 Federal Plaza  
Central Islip, NY 11722-4451

Attention: Magistrate Judge Arlene R. Lindsay

Re: **Volpe v. Ryder**  
19-cv-02236 (JMA)(ARL)

Magistrate Lindsay:

As the Court is aware, this office has very recently been retained to represent Plaintiff, Charles Volpe, in the above-referenced matter. We are in possession of predecessor counsel's legal file, which is comprised of several thousand pages of documents and several hours of video surveillance footage. Given the sheer volume of documents, this office is unable to get up to speed in time to comply with the scheduling order currently in place.

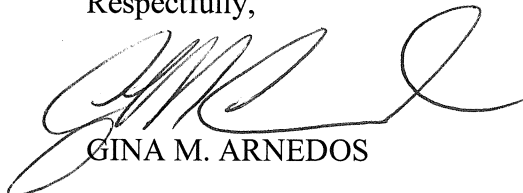
The undersigned has conferred with defense counsel, Aaron Solomon, and we have agreed to the proposed scheduling order as follows:

- Fact discovery to be completed by 05/30/21;
- All discovery, inclusive of expert witness discovery, to be completed by 07/30/21;
- First step for filing of dispositive motions to be completed by 09/30/21.

Should Your Honor order this proposed schedule, we request that a final conference be scheduled for a date convenient to the Court.

We thank the Court for its consideration.

Respectfully,



GINA M. ARNEDES

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